

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FANAYE TURNER,

Plaintiff,

vs.

UNIVERSITY OF WASHINGTON and  
BUDDY RATNER,

Defendants.

NO. CV05-1575L

DECLARATION OF MICHAEL  
MADDEN IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT

**Note on Motion Calendar:  
Friday, March 16, 2007**

Michael Madden declares as follows:

1. I am one of the attorneys for the Defendants in this matter and have personal knowledge of the matters stated.

2. Attached hereto as **Exhibit 1**, is a true and correct copy of the following deposition pages from the Deposition of Dr. Buddy Ratner taken on October 30, 2006: 7-8; 12-13; 19; 27-28; 65-67; 105-109; 155-156; 176-180; 190; 192-200.

3. Attached hereto as **Exhibit 2**, is a true and correct copy of Exhibit 28 to the Deposition of Fanaye Turner taken on October 27, 2006 (Doc. No. UW\_TUR10028-10031; Memorandum from Melissa Cochran to Fanaye Turner dated May 22, 2002).

1           4.       Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit 188 to the  
2 Deposition of Nina Hanlon taken on January 22, 2007 (Email from Fanaye Turner to Jeri  
3 Staley-Earnst dated July 11, 2002).

4           5.       Attached hereto as **Exhibit 4**, is a true and correct copy of Exhibit 102 to the  
5 Deposition of Buddy Ratner taken on October 30, 2006 (Memorandum from Dr. Andrew  
6 Branca to Lorease Kendrick dated April 7, 2003).

7           6.       Attached hereto as **Exhibit 5**, is a true and correct copy of Exhibit 279 to the  
8 Deposition of Debbie Flores taken on January 29, 2007 (Doc. No. UW\_TUR30049-30050;  
9 Debbie Flores' notes regarding March 27, 2003 incident between Fanaye Turner and Nina  
10 Hanlon).

11           7.       Attached hereto as **Exhibit 6**, is a true and correct copy of Exhibit 208A to the  
12 Deposition of Mike Keller taken on January 24, 2007 (Doc. Nos. UW\_TUR10012-10014;  
13 UCIRO Initial Intake Sheet dated April 3, 2003; Email from UCIRO to Kevin Rainge dated  
14 April 4, 2003; Email from Jill beaver Lee to Dr. Yongmin Kim dated April 18, 2003).

15           8.       Attached hereto as **Exhibit 7**, is a true and correct copy of Exhibit 208A to the  
16 Deposition of Mike Keller taken on January 24, 2007 (Doc. No. UW\_TUR10019; Letter from  
17 Mike Keller to Fanaye Turner dated May 28, 2003).

18           9.       Attached hereto as **Exhibit 8**, is a true and correct copy of Exhibit 154 to the  
19 Deposition of Rita Jensen taken on January 19, 2007 (Doc No. UW\_TUR20407; Email from  
20 Rita Jensen to Lorease Kendrick dated April 03, 2003).

21           10.       Attached hereto as **Exhibit 9**, is a true and correct copy of an UCIRO Report  
22 of Investigation dated December 22, 2003 (Doc. No. UW\_TUR30102-30113).  
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1 11. Attached hereto as **Exhibit 10**, is a true and correct copy of an email from Jeri  
2 Staley-Earnst to Buddy Ratner dated January 13, 2004 (Doc. No. UW\_TUR681133).

3 12. Attached hereto as **Exhibit 11**, is a true and correct copy of Exhibit 174 to the  
4 Deposition of Rita Jensen taken on January 19, 2007 (Doc No. FT-1363; Email from Fanaye  
5 Turner to Buddy Ratner, et al. dated January 11, 2004).

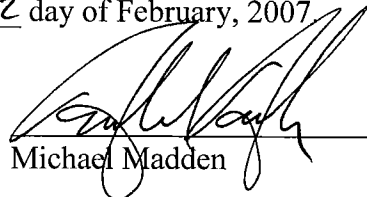
6 13. Attached hereto as **Exhibit 12**, is a true and correct copy of Exhibit 109 to the  
7 deposition of Buddy Ratner taken on October 30, 2006 (Email from Fanaye Turner to Buddy  
8 Ratner dated January 23, 2004).

9 13. Attached hereto as **Exhibit 13**, is a true and correct copy of an email from  
10 Fanaye Turner to Jeri Staley-Earnst dated April 7, 2003 (Doc. No. UW\_TUR669533).

11 13. Attached hereto as **Exhibit 14**, is a true and correct copy of the following  
12 deposition pages from the Deposition of Fanaye Turner taken on October 26, 2006: 145; 187-  
13 189; 205; 221-223.  
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15  
16 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE  
17 STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

18 Executed at SEATTLE, Washington, this 22 day of February, 2007

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21 Michael Madden

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